

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JANE DOE,)	
)	
Plaintiff,)	
)	
v.)	
)	
WILLIAMS BOWERS MANAGEMENT,)	Case No. 3:23-cv-00477
LLC D/B/A WIDE OPEN MUSIC, ASH)	
BOWERS, JIMMIE ALLEN, and JOHN)	
DOES 1-100,)	
)	
Defendants.)	

**DEFENDANT WILLIAMS BOWERS MANAGEMENT, LLC’S
RESPONSE TO PLAINTIFF’S MOTION FOR
PROTECTIVE ORDER TO PROCEED UNDER A PSEUDONYM**

Defendant Williams Bowers Management, LLC (“WBM”) does not take a position on Plaintiff Jane Doe’s request to proceed under a pseudonym at this time. (ECF No. 32.) WBM fully adopts, however, the arguments presented in Defendant Ash Bowers’ Response brief (ECF No. 44) and Defendant Jimmie Allen’s Response brief (ECF No. 45, at 17–18) in opposition to Plaintiff’s attempt to extend the pseudonym beyond herself to family members and to provide for overly harsh, unwarranted and unconstitutional remedies in the event of a violation of the proposed Protective Order.

Respectfully submitted,

s/ John P. Rodgers

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2023, a true and correct copy of the foregoing was served via the Court's electronic case filing system upon the following:

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